

FILED

Dec 15 2020

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

SEALED BY ORDER OF THE COURT

STEPHANIE M. HINDS (CABN 154284)
Attorney for the United States,
Acting Under Authority Conferred By 28 U.S.C. § 515

HALLIE HOFFMAN (CABN 210020)
Chief, Criminal Division

JEFF SCHENK (CABN 234355)
JOHN C. BOSTIC (CABN 264367)
ROBERT S. LEACH (CABN 196191)
VANESSA BAEHR-JONES (CABN 281715)
Assistant United States Attorneys

150 Almaden Boulevard, Suite 900
San Jose, California 95113
Telephone: (408) 535-5061
Fax: (408) 535-5066
Vanessa.Baehr-Jones@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 18-CR-00258 EJD
)	
Plaintiff,)	DECLARATION OF VANESSA BAEHR-JONES
)	IN SUPPORT OF UNITED STATES' OMNIBUS
v.)	REPLY
)	
ELIZABETH HOLMES and RAMESH)	<u>[FILED PROVISIONALLY UNDER SEAL</u>
"SUNNY" BALWANI,)	<u>PURSUANT TO COURT ORDER OF JANUARY</u>
)	<u>13, 2020]</u>
Defendants.)	

I, Vanessa Baehr-Jones, declare:

1. I am an Assistant United States Attorney (AUSA) representing the United States of America, the plaintiff in this case.

2. Attached hereto as Exhibit 1 is a true and correct copy of a Federal Bureau of Investigation (FBI) 302 report of interview for Paige Williams.

3. Attached hereto as Exhibit 2 is a true and correct copy of an FBI 302 report of interview for Nicole Canas.

1 4. Attached hereto as Exhibit 3 is a true and correct copy of a video clip, dated July 15,
2 2015, depicting Defendants Elizabeth Holmes and Ramesh Balwani at a Theranos event.

3 5. Attached hereto as Exhibit 4 is a true and correct copy of a video clip, dated July 15,
4 2015, depicting Holmes and Balwani at a Theranos event.

5 6. Attached hereto as Exhibit 5 is a true and correct copy of a video clip, dated April 7,
6 2015, depicting Holmes and Balwani at a Theranos event.

7 7. Attached hereto as Exhibit 6 is a true and correct copy of a video clip, dated April 7,
8 2015, depicting Holmes and Balwani at a Theranos event.

9 8. Attached hereto as Exhibit 7 is a true and correct copy of a video clip, dated April 7,
10 2015, depicting Holmes and Balwani at a Theranos event.

11 9. Attached hereto as Exhibit 8 is a true and correct copy of a video clip, dated April 7,
12 2015, depicting Holmes and Balwani at a Theranos event.

13 10. Attached hereto as Exhibit 9 is a true and correct copy of a video clip, dated April 7,
14 2015, depicting Holmes and Balwani at a Theranos event.

15 11. Attached hereto as Exhibit 10 is a true and correct copy of a video clip, dated April 7,
16 2015, depicting Holmes and Balwani at a Theranos event.

17 12. Attached hereto as Exhibit 11 is a true and correct copy of a video clip, dated April 7,
18 2015, depicting Holmes and Balwani at a Theranos event.

19 13. Attached hereto as Exhibit 12 is a true and correct copy of a video clip, dated April 7,
20 2015, depicting Holmes and Balwani at a Theranos event.

21 14. I declare under penalty of perjury under the laws of the United States of America that the
22 foregoing is true and correct and that this declaration is executed at Oakland, California, on December
23 11, 2020.

24 DATED: December 11, 2020

25 
26 _____
27 VANESSA BAEHR-JONES
28 Assistant United States Attorney